

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

DEWANNA ANN NORMAN, as
Administrator of the Estate of
JOSHUA
BERNARD HORNE, Deceased,

Plaintiff,

v.

SINGH SOBATPREET, 2111606
ALBERTA, LTD. d/b/a TRANSKING
TRUCKING, and INTACT
FINANCIAL CORPORATION,

Defendants.

CIVIL ACTION FILE
NO.

**DEFENDANTS' NOTICE OF REMOVAL TO UNITED STATES
DISTRICT COURT**

TO: The Honorable Judges of the United States District Court for the Middle District
of Georgia, Macon Division:

COME NOW, **SINGH SOBATPREET, 2111606 ALBERTA, LTD. d/b/a
TRANSKING TRUCKING, and INTACT FINANCIAL CORPORATION,**
(hereinafter "Defendants"), and files the following Notice of Removal to United States
District Court, showing the Court as follows:

1. This civil action was filed on or about May 12, 2022 in the State Court of Bibb County, State of Georgia. That action is designated there as Civil Action File No.: 22-SCCV-094255. In the Complaint, Plaintiff alleges in excess of \$169,210.32 in special damages. (Compl. ¶ 13).

2. Defendant files herewith a copy of all process, pleadings, and orders received by Defendant in Civil Action File No.: 22-SCCV-094255, pursuant to 28 USC §1446.

3. Defendant Sobatpreet Singh (incorrectly identified as Singh Sobatpreet), is now, was at the commencement of Civil Action File No.: 21-SCCV-093228, and at all times since a citizen of and resident of Windsor, Ontario, Canada. (Compl. ¶ 1).

4. Defendant 2111606 Alberta LTD d/b/a Transking Trucking was incorporated in Calgary, Alberta, Canada and had its principal office at the time of filing of Civil Action File No.: 21-SCCV-093228, and at all times since has been located in Alberta, Canada. (Compl. ¶ 2).

5. Defendant Intact Financial Corporation was at the commencement of Civil Action File No.: 21-SCCV-093228, and at all times since has been an entity organized and existing under the laws of and with its principal place of business in Ontario, Canada.

6. Upon information and belief, Plaintiff is an individual residing in the State of Georgia.

7. The action described above is a civil action with a claim of which this Court has original jurisdiction, and it is one that may be removed to this Court by the Defendants pursuant to the provisions of 28 USC §§ 1332 and 1441 et seq., in that there is complete diversity among the Parties, the Parties are not residents of the same State, and Plaintiff has alleged an amount in excess of \$75,000.00, therefore the amount in controversy exceeds \$75,000.00 exclusive of interest and costs. (Compl. ¶ 13).

8. Defendants attach hereto a copy of the Summons and Complaint filed in the State Court of Bibb County, State of Georgia, marked as Exhibit “A”.

9. Defendants attach hereto a copy of Defendant's Notice of Removal which has been sent for filing in the State Court of Bibb County, State of Georgia, marked as Exhibit “B”.

10. All Defendants agree to this removal.

WHEREFORE, Defendants prays that the above action now pending against it in the State Court of Bibb County, State of Georgia, be removed to this Court.

Respectfully submitted on this 9th day of June, 2022.

HALL BOOTH SMITH, P.C.

/s/ Sean B. Cox

SEAN B. COX

Georgia State Bar No. 664108

SANDRO STOJANOVIC

Georgia State Bar No. 473114

Counsel for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANT'S NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT** upon all parties to this matter by depositing same in the U.S. Mail, proper postage prepaid, addressed to counsel of record and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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Counsel for Plaintiff

Respectfully submitted on this 9th day of June, 2022.

HALL BOOTH SMITH, P.C.

/s/ Sean B. Cox
SEAN B. COX
Georgia State Bar No. 664108
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